

UNITED STATES OF AMERICA  
DISTRICT OF MASSACHUSETTS

CRIMINAL NO.: 04-10336

UNITED STATES OF AMERICA  
v.  
SANTIAGO ET AL.

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**DEFENDANT JOSE TORRADO'S MOTION FOR MODIFICATION OF HIS  
CONDITIONS OF RELEASE [ASSENTED]**

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Now comes the defendant, JOSE TORRADO and moves this Honorable Court, with the assent of the government, to modify his conditions of release, so that he may work at a different location. Mr. Torrado is presently on the electronic monitor from 9:00 P.M. until 6 A.M. on weekdays. On Friday, May 12, 2006, Mr. Torrado was laid off from his employment at Atlantic Used Truck and Salvage Corporation. His employer provided a letter of recommendation which indicates that he has been an excellent worker and that the layoff was due exclusively to the slow economic period of the firm. Mr. Torrado immediately advised his pre-trial supervisor, Chris Wylie. On Tuesday, May 16, 2006, Mr. Torrado was offered employment at California Products, 150 Dascond Rd. , Andover MA 01810 . His job will be to package and ship paints. If the Court approves this motion , he will start on Monday, May 22, 2006

Mr. Torrado has been on the electronic bracelet for more than one year and has been one hundred percent compliant with all his conditions. In all other respects, the conditions of pre-trial release will remain the same.

WHEREFORE, he prays that this Court grant the motion.

Respectfully submitted,

JOSE TORRADO

By his attorney,

/s/ Lenore Glaser, Esq. \_\_\_\_\_

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Assented by

/s/ William F. Bloomer, Esq. \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I, Lenore Glaser, hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants (Anthony Scola, and John Hodges) on May 17, 2006.

Lenore Glaser, Esq. \_\_\_\_\_

Dated : May 17, 2006